

# **Exhibit 25**

## **Wisconsin Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**Wisconsin– Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on December 1, 2024 to the Wisconsin (i) Department of Children & Families, (ii) Department of Health Services, (iii) Department of Public Instruction, (iv) Office of Children’s Mental Health, and (v) Governor’s Office. At a high level, Meta’s proposal involves using search combinations that require a “Social Media Term,” “Harm Term,” or “Policy Term” to occur in the same document as one of the following “Youth Terms”:

(teen OR adolescent OR youth OR minor OR young OR child OR kid)

#	Social Media Terms
1	“Youth Terms” AND (“social media” OR “social network” OR Facebook OR Instagram OR Youtube OR Snapchat OR TikTok OR Twitter OR Discord OR Twitch OR Reddit OR Pinterest OR Tumblr)
	<b>Harm Terms</b>
2	“Youth Terms” AND (wellbeing OR wellness OR well-being OR mental health OR social health OR emotional health OR behavioral health OR anxiety OR depression OR stress OR insomnia)
3	“Youth Terms” AND (“pro-ana” OR “BMI” OR overweight OR obese OR anorexia OR bulimia OR orthorexia OR suicide OR “self-harm” OR cutting)
4	“Youth Terms” AND (bullying OR cyberbullying OR sextortion OR transphobia OR homophobia OR racism OR sexism)
5	“Youth Terms” AND (violence OR assault OR fight OR shoot OR threat OR gun OR firearm OR rape OR murder OR hate)
6	“Youth Terms” AND (dopamine OR “rabbit hole” OR “social reward” OR “screen time” OR “time spent” OR “monthly active users” OR “daily active users” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “impulse control”) AND (“social media” OR Facebook OR Instagram OR Youtube OR Snapchat OR TikTok OR Twitter OR Discord OR Twitch OR Reddit OR Pinterest OR Tumblr)
7	“Youth Terms” AND (eat OR eating)
8	“Youth Terms” AND (sleep OR sleeping)
9	“Youth Terms” AND (negative) AND (appearance OR experience)
10	“Youth Terms” AND (compare OR comparative) AND (appearance OR social OR negative)

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11	“Youth Terms” <b>AND</b> (body) <b>AND</b> (acceptance OR dissatisfaction OR “positive image” OR dysmorphia)
12	“Youth Terms” <b>AND</b> (“self-esteem”) <b>AND</b> (harm OR control OR injury OR mutilation)
13	“Youth Terms” <b>AND</b> (Covid OR coronavirus OR pandemic OR lockdown OR quarantine OR “social distance”)
14a	“Youth Terms” <b>AND</b> (“e-cig” OR cigarette OR vaping OR smoking OR nicotine OR tobacco)
14b	“Youth Terms” <b>AND</b> (cannabis OR marijuana OR heroin OR cocaine OR fentanyl OR opioid OR meth OR oxycontin OR “drug use”)
14c	“Youth Terms” <b>AND</b> (alcohol)
	<b>Policy Terms</b>
15	“Youth Terms” <b>AND</b> (policy OR practice OR presentation OR initiative OR legislation OR advocacy OR lobby OR law) <b>AND</b> (“social media” OR Facebook OR Instagram OR Youtube OR Snapchat OR TikTok OR Twitter OR Discord OR Twitch OR Reddit OR Pinterest OR Tumblr)

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**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Wisconsin AG’s office during the course of the Parties’ negotiations. To the extent the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Children & Families	Alexander Gagnon*	Not provided
Dept. of Children & Families	Asia Jackson*	Not provided
Dept. of Children & Families	Carlton Frost*	Not provided
Dept. of Children & Families	Demetra Parr-Nelson*	Not provided
Dept. of Children & Families	Devon Syrjanen*	Not provided
Dept. of Children & Families	Katie Davis*	Not provided
Dept. of Children & Families	Emily Erickson*	Not provided
Dept. of Children & Families	Gina Paige*	Not provided
Dept. of Children & Families	Heather Clancy*	Not provided
Dept. of Children & Families	Jill Collins*	Not provided

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Children & Families	Kimberly Edwards*	Not provided
Dept. of Children & Families	Stacy Saddison*	Not provided
Dept. of Children & Families	Terra Klein*	Not provided
Dept. of Health Services	Karen Bittner*	Not provided
Dept. of Health Services	Alexandra A. Cammilleri*	Not provided
Dept. of Health Services	Jason M. Cram*	Not provided
Dept. of Health Services	Julie A. Janus*	Not provided
Dept. of Health Services	Ann M. Kelley-Kuehmichel*	Not provided
Dept. of Health Services	Monique M. Larson Hicks*	Not provided
Dept. of Health Services	Sally C. Raschick*	Not provided
Dept. of Health Services	Elizabeth E. Rudy*	Not provided
Dept. of Health Services	Arielle Exner*	Not provided
Dept. of Health Services	HJ Waukau*	Not provided
Dept. of Health Services	Andrew Hoyer-Booth*	Not provided
Dept. of Health Services	Lisa Olson*	Not provided

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Health Services	Elizabeth Portz*	Not provided
Dept. of Health Services	John Hoelter*	Not provided
Dept. of Health Services	Alexander Ignatowski*	Not provided
Dept. of Health Services	Kyle O'Brien*	Not provided
Dept. of Health Services	Syed Abbas*	Not provided
Dept. of Health Services	Andrea Gugel*	Not provided
Dept. of Health Services	Elizabeth Goodsitt*	Not provided
Dept. of Health Services	Andrew Forsaith*	Not provided
Dept. of Health Services	Adrian Herrera*	Not provided
Dept. of Public Instruction	Benjamin Miller*	Director, Library Services Team
Dept. of Public Instruction	Monica Treptow*	Education Consultant, Library Services Team
Dept. of Public Instruction	Visalakshi Somasundaram*	Director, Office of Educational Accountability
Dept. of Public Instruction	Samuel Bohrod*	Director, Office of Educational Accountability
Dept. of Public Instruction	Philip Olsen*	Assistant Director, Office of Educational Accountability
Dept. of Public Instruction	Christopher Bucher*	Interim Director and Communications Officer, Education Information Services

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Public Instruction	Abigail Swetz*	former Director, Education Information Services
Dept. of Public Instruction	Beth Tomev*	former Director, Education Information Services
Dept. of Public Instruction	Alex Elmore*	Communications Specialist; Education Information Services
Dept. of Public Instruction	Jennifer Rosen-Heinz*	Communications Specialist, Education Information Services
Dept. of Public Instruction	Jill Underly*	State Superintendent of Public Instruction
Dept. of Public Instruction	Carolyn Stanford-Taylor*	former State Superintendent of Public Instruction
Dept. of Public Instruction	Tony Evers*	former State Superintendent of Public Instruction
Dept. of Public Instruction	Thomas McCarthy*	Deputy State Superintendent
Dept. of Public Instruction	John Johnson*	former Deputy State Superintendent
Dept. of Public Instruction	Michael Thompson*	former Deputy State Superintendent
Dept. of Public Instruction	Kevyn Radcliffe*	Legislative Liaison, Office of the State Superintendent
Dept. of Public Instruction	Dee Pettack*	Legislative Liaison, Office of the State Superintendent
Dept. of Public Instruction	Sachin Chheda*	Executive Director, Office of the State Superintendent
Dept. of Public Instruction	Scott Jones*	former Chief of Staff, Office of the State Superintendent
Dept. of Public Instruction	Emilie Amundson*	former Chief of Staff, Office of the State Superintendent

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Public Instruction	Susan Piazza*	Director, Student Services – Prevention and Wellness
Office of Children’s Mental Health	Linda Hall*	Not provided
Office of Children’s Mental Health	Andrea Turtenwald*	Not provided
Office of Children’s Mental Health	Karen Katz*	Not provided
Office of Children’s Mental Health	Amy Marsman*	Not provided
Office of Children’s Mental Health	Kate McCoy*	Not provided
Office of Children’s Mental Health	Melissa Murphy*	Not provided
Office of Children’s Mental Health	Ellie Trulson*	Not provided
Governor’s Office	Jenni Dye*	Not provided
Governor’s Office	Katie Domina*	Not provided
Governor’s Office	Britt Cudaback*	Not provided
Governor’s Office	Camille Crary*	Not provided
Governor’s Office	Emma Thelke*	Not provided
Governor’s Office	Barb Worchester*	Not provided



Wisconsin Agency Proposals as of December 6, 2024 at 2pm CT

**DHS/OCMH**

Proposed time period of January 1, 2015 to present

**First Set**

1. “social media” OR “social network” OR Facebook OR Instagram OR Youtube OR Snapchat OR TikTok OR Twitter OR Discord OR Twitch OR Reddit OR Pinterest OR Tumblr AND teen OR adolescent OR youth OR minor OR kid AND “use of” AND benefit OR harm AND research OR study OR report OR survey OR analysis OR evaluation

**Second Set**

2. wellbeing OR wellness OR anxiety OR depression OR stress AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health” AND research OR study OR report OR survey OR analysis OR evaluation
3. “pro-ana” OR “BMI” OR overweight OR obese OR anorexia OR bulimia OR orthorexia OR suicide OR “self-harm” OR cutting AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
4. bullying OR cyberbullying OR sextortion OR transphobia OR homophobia OR racism OR sexism AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
5. violence OR assault OR fight OR shoot OR threat OR gun OR firearm OR rape OR murder OR hate AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
6. dopamine OR “rabbit hole” OR “social reward” OR “screen time” OR “time spent” OR “monthly active users” OR “daily active users” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “impulse control” AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health” AND “social media” OR Facebook OR Instagram OR Youtube OR Snapchat OR TikTok OR Twitter OR Discord OR Twitch OR Reddit OR Pinterest OR Tumblr
7. eat AND problem OR difficulties OR disorder AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
8. sleep AND disorder OR difficulties OR problem OR deprivation AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”

9. negative AND appearance OR experience AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
10. compare OR comparative AND appearance AND social OR negative AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
11. body AND acceptance OR dissatisfaction OR “positive image” OR dysmorphia AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
12. “self-esteem” AND harm OR control OR injury OR mutilation AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
13. Covid OR coronavirus OR pandemic OR lockdown OR quarantine OR “social distance” AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
14.
  - a. “e-cig” OR cigarette OR vaping OR smoking OR nicotine OR tobacco AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
  - b. cannabis OR marijuana OR heroin OR cocaine OR fentanyl OR opioid OR meth OR oxycontin OR “drug use” AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”
  - c. alcohol AND “effect on” AND teen OR adolescent OR youth OR minor OR kid AND “mental health” OR “social health” OR “emotional health” OR “behavioral health”

#### Third Set

15. policy OR practice OR presentation OR initiative OR legislation OR advocacy OR lobby OR law AND “use of” AND teen OR adolescent OR youth OR minor OR kid AND “social media” OR Facebook OR Instagram OR Youtube OR Snapchat OR TikTok OR Twitter OR Discord OR Twitch OR Reddit OR Pinterest OR Tumblr

Record custodians for the first and second set of search terms:

- Linda Hall
- Andrea Turtenwald
- Karen Katz
- Amy Marsman
- Kate McCoy (former employee)
- Melissa Murphy (former employee)

- Ellie Trulson (former employee)
- Karen Bittner
- Alexandra Cammilleri
- Jason Cram
- Julie Janus
- Ann Kelley-Kuehmichel
- Monique Larson Hicks
- Sally Raschick
- Elizabeth Rudy
- Teresa Steinmetz (former employee)
- Jason Fischer
- Jennifer Miller
- Elizabeth Goodsitt

Record custodians for the third set of search terms:

- Linda Hall
- Andrea Turtenwald
- Karen Katz
- Amy Marsman
- Kate McCoy (former employee)
- Melissa Murphy (former employee)
- Ellie Trulson (former employee)
- Karen Bittner
- Alexandra Cammilleri
- Jason Cram
- Julie Janus
- Ann Kelley-Kuehmichel
- Monique Larson Hicks
- Sally Raschick
- Elizabeth Rudy
- Teresa Steinmetz (former employee)
- Jason Fischer
- Jennifer Miller
- Elizabeth Goodsitt
- Arielle Exner
- Syed Abbas
- HJ Waukau (former employee)
- Andrew Hoyer-Booth (former employee)
- Lisa Olson (former employee)
- Elizabeth Portz (former employee)
- Andrea Gugel (former employee)

**DPI**

Custodians

Christopher Bucher, Interim Director and Communications Officer, Education Information Services;  
Abigail Swetz, former Director, Education Information Services;  
Beth Tomev, former Director, Education Information Services;  
Alex Elmore, Communications Specialist; Education Information Services; and  
Jennifer Rosen-Heinz, Communications Specialist, Education Information Services:  
Jill Underly, State Superintendent of Public Instruction;  
Carolyn Stanford-Taylor, former State Superintendent of Public Instruction;  
Tony Evers, former State Superintendent of Public Instruction;  
Thomas McCarthy, Deputy State Superintendent;  
John Johnson, former Deputy State Superintendent;  
Michael Thompson, former Deputy State Superintendent;  
Kevyn Radcliffe, Legislative Liaison, Office of the State Superintendent;  
Dee Pettack, former Legislative Liaison, Office of the State Superintendent;  
Sachin Chheda, Executive Director, Office of the State Superintendent;  
Scott Jones, former Chief of Staff, Office of the State Superintendent;  
Emilie Amundson, former Chief of Staff, Office of the State Superintendent; and  
Susan Piazza, Director, Student Services – Prevention and Wellness.

Proposed search string:

("social media" AND "youth mental health") OR ("media inquiry" AND ("youth mental health" AND ("ESSER" OR "ESSER III" OR "ARP"))) OR ("social media platform\*" AND ("youth mental health" OR "youth mental wellbeing")) OR ("youth mental health" AND "social emotional behavior") OR ("tik tok" AND ban) OR (proposed AND ("mental wellbeing" OR "youth mental health")) OR ("p draft" AND ("mental health" OR "mental wellbeing" OR "social emotional behavior")) OR (bill AND ("youth mental health" OR "social emotional behavior" OR "mental wellbeing")) OR ("mental health AND wellbeing" AND (report OR study OR survey)) OR "cell phone use" OR "video games" OR ("May 2023" AND "US Surgeon General's Advisory") OR (model AND policy AND bullying) OR (eat\* NEAR(3) (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\* OR agitat\* OR behav\* OR insufficient OR depriv\*)) OR (sleep\* NEAR(3) (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\* OR agitat\* OR behav\* OR insufficient OR depriv\*)) OR (body NEAR (3) (accept\* OR dissatisfaction OR positiv\* OR image OR dysmorph\*)) (c:c) (date>2014-01-01)

**DCF**

Search terms

- (1) (“social media” or facebook or Instagram) AND (youth or child) AND (depression or anxiety or “sleep disturbances” or suicide or self-harm or “compulsive use” or “mental health”)
- (2) covid AND “remote learning” and (“mental health” OR wellbeing)

DCF e-mail search custodians

Asia Jackson	Division of Safety and Permanency
Emily Erickson	Division of Safety and Permanency
Gina Paige	Communications Director
Jill Collins	Division of Milwaukee Child Protective Services

DCF S drive searches using inquiries above:

DCF proposes running the same searches listed above in the following locations on the DCF S drive:

- S:\DSP\All DSP\Communications
- S:\DMCPS\Ongoing Services\All Users\Ongoing Services Section\Contract Partners
- S:\BYS\2-Prevention and Intervention\Anti-Human Trafficking
- S:\BYS\COVID-19
- S:\BSWB\Research Articles
- S:\BSWB\Sex Trafficking
- S:\BSWB\Trauma

**Governor’s Office**

Custodians and Search Terms

- Jenni Dye, Deputy Chief of Staff
- Britt Cudaback, Communications Director
- Katherine Domina, Policy Director
- Camille Crary, Policy Advisor
- Emma Thelke, Policy Advisor
- Barbara Worcester, Deputy Chief of Staff

Search terms

Search string 1: “social media” NEAR(3) (youth OR child\* OR kid\* OR “mental health” OR wellbeing OR well-being OR “well being” OR depression OR anxiety OR “sleep disturbances” OR suicide OR self-harm OR “self harm” OR “compulsive use” OR addiction)

Search string 2: “office of children’s mental health” OR “OCMH” OR “get kids ahead initiative” OR “GKAI”

Search string 3: (Facebook OR Instagram OR TikTok OR YouTube OR Twitter OR Pinterest OR LinkedIn OR BeReal OR Lapse OR Reddit OR Threads OR VSCO OR Goodreads OR Quora OR Discord OR Twitch OR Tumblr) NEAR(3) (youth OR child\* OR kid\* OR “mental health” OR wellbeing OR well-being OR “well being” OR depression OR anxiety OR “sleep disturbances” OR suicide OR self-harm OR “self harm” OR “compulsive use” OR addiction)

Search string 4: ("social media" AND "youth mental health") OR ("media inquiry" AND ("youth mental health" AND ("ESSER" OR "ESSER III" OR "ARP"))) OR ("social media platform\*" AND ("youth mental health" OR "youth mental wellbeing")) OR ("youth mental health" AND "social emotional behavior") OR ("tik tok" AND ban) OR (proposed AND ("mental wellbeing" OR "youth mental health")) OR ("p draft" AND ("mental health" OR "mental wellbeing" OR "social emotional behavior")) OR (bill AND ("youth mental health" OR "social emotional behavior" OR "mental wellbeing")) OR ("mental health AND wellbeing" AND (report OR study OR survey)) OR "cell phone use" OR "video games" OR ("May 2023" AND "US Surgeon General's Advisory") OR (model AND policy AND bullying) OR (eat\* NEAR(3) (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\* OR agitat\* OR behav\* OR insufficient OR depriv\*)) OR (sleep\* NEAR(3) (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\* OR agitat\* OR behav\* OR insufficient OR depriv\*)) OR (body NEAR (3) (accept\* OR dissatisfaction OR positiv\* OR image OR dysmorph\*))

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK  
4:23-cv-05448-YGR

This Filing Relates to:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

**DECLARATION OF GARY ENGEN**

I, Gary Engen, declare under penalty of perjury that the following is true and correct to the best of my knowledge.

1. I make this declaration based upon my personal knowledge.
2. I am contracted to work as the Server Administrator for the Bureau of Information Technology Services (BITS) within the Wisconsin Department of Children and Families (DCF). I have held this position since April 2012.
3. In my role, I manage and search network drives and email inboxes.
4. BITS is responsible for providing technology services across all divisions of DCF, including data administration; application support; server and network support; workstation support; data collection and processing; and technology strategy and planning.
5. My role in assisting with discovery in the above referenced matter has been supporting the Office of Legal Counsel for DCF by conducting searches of network drives and email accounts.



6. DCF has limited technical capability to conduct complex searches for documents and emails. Our current software does not support advanced Boolean searches within email accounts. This limitation significantly affects our ability to design and execute searches that incorporate a broader range of terms, such as those proposed by Meta. As a result, we face challenges in performing comprehensive and efficient searches for discovery purposes. Upgrading our software to fix this would take a lot of time and money (approximately 60-80 hours of staff time plus the cost of the solution), and it depends on finding the right tools. Unfortunately, even if approval were given to pursue these tools, it would not be possible to complete the upgrades in time to meet the Meta discovery deadlines.

7. Conducting searches using these specific terms has created a significant burden on DCF in terms of time, resources, and system operations. Each keyword search related to this case has required extensive effort, including running the searches, downloading results, testing terms, and refining the process. BITS has already spent over 24 hours on these activities to develop the current proposal. The proposed search includes email searches resulting in approximately 14,700 items, which take up a large amount of storage and strains system capacity.

8. This is one of the largest searches DCF has ever conducted, highlighting the operational and logistical challenges. Across multiple drives, there are over 64 GB of emails and nearly 8 GB of documents from network drive searches. While these searches have not yet



affected the network, they are impacting BITS staff and interfering with the maintenance of business and other work.

9. DCF is unable to generate an exact hit report for search terms or search strings without first downloading all the items that match the search.

10. DCF has been running test searches on its network drive, with one search running for 23 hours but producing no results. The limitations in our current technology are increasing the time and resources needed to complete these searches. Additionally, the time spent on these efforts has taken BITS staff away from their primary role of keeping systems running, which supports DCF's vision to ensure that all Wisconsin children and youth are safe and loved members of thriving families and communities.

11. Running the searches outlined in Meta's proposal and downloading all the resulting documents is not feasible. The time and resources needed to handle the large volume of data would be significant. Storing the results would require a huge amount of space, and downloading the files could take several days or even weeks. This process would severely disrupt normal BITS operations, which are vital to assisting children and families, making it harder to manage other critical tasks and resources.

12. In consulting with management, performing the proposed searches would require additional IT staffing resources, which are not currently available. Moreover, the extra storage

space required would strain our systems, and carrying out these searches would significantly slow down DCF operations.

*Pursuant to 28 USC § 1746, I verify under penalty of perjury that the statements in this declaration are true and correct and based upon my personal knowledge.*

Dated this 5<sup>th</sup> day of December 2024.

A handwritten signature in blue ink, appearing to read "Gary Engen", is written over a horizontal line.

Gary Engen  
Server Administrator  
Bureau of Information Technology Services  
Department of Children and Families